

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

JAMIE LAMBERTZ-BRINKMAN,)	
LAURA RIVERA, CHRISTA STORK,)	
and Jane Does 4 through 10, on behalf)	
of themselves and all others similarly)	
situated,)	
)	
Plaintiffs,)	Civ. 07-3040
)	
v.)	
)	
KELLIE WASKO, Secretary of the South)	
Dakota Department of Corrections,)	
AARON MILLER, Warden of the South)	
Dakota Women's Prison, and J. DOE,)	
Clinical Supervisor for Correctional)	
Health Services at the South Dakota)	
Women's Prison, and John Doe Defendants,)	
)	
Defendants.)	

**Motion to Hold Defendants in Civil Contempt
and for Appropriate Remedies**

Brenda Schurr, an inmate at the South Dakota Women's Prison who is a member of the class in this case, and who is protected by the injunction this Court entered on April 17, 2012, moves to hold defendants in civil contempt and for appropriate remedies. Defendants are the successors in interest to the public officer

defendants when the injunction was issued (J. Doe's identity is unknown—the previous Clinical Supervisor, Jennifer Seale, left the position on March 8, 2023), and are automatically substituted as parties pursuant to F.R.Civ.P. 25(d). This motion is supported by the Affidavit of Brenda Schurr, the Declaration of James D. Leach, and the brief filed herewith.

Dated: March 27, 2023

Respectfully submitted,

/s/ James D. Leach

James D. Leach

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Attorney for Brenda Schurr

Certificate of Service

I certify that on March 27, 2023, I served this document on defendants' attorney Michael F. Shaw by filing it electronically, thereby causing him to be served, and that I also emailed him copies directly at mfs@mayadam.net.

/s/ James D. Leach

James D. Leach